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UNITED STATES DISTRICT COURT

for the

Northern District of California

APR 03 2019
CLERK OF COURT
NORTHERN DISTRICT OF CALIFORNIA

United States of America

v.

Evgeni Kopankov,
Emanuel Borisov,
Paul Brooks,

Case No. 19-mj-70500

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 28, 2019 to April 3, 2019 in the county of San Francisco in the
Northern District of California, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 1951

Interference with Commerce By Threats or Violence

Maximum 20 Years' Imprisonment; Maximum Fine of \$250,000; Maximum
Supervised Release of 3 years; Mandatory \$100 Special Assessment

This criminal complaint is based on these facts:

Please see attached affidavit of FBI Special Agent Richard A. Smith.

Approved as to form

AUSA Neal C. Hong

Neal Hong by Richard A. Smith
Rick Smith☒ Continued on the attached sheet.
Complainant's signature

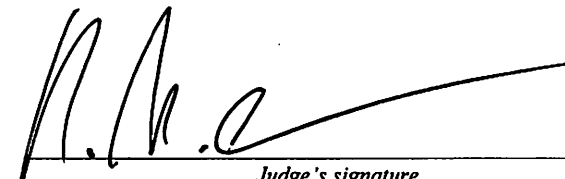
Richard Smith, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

April 3, 2019



Judge's signature

City and state:

San Francisco, California

Robert M. Illman, Magistrate Judge

Printed name and title



AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Richard A. Smith, a Special Agent with the Federal Bureau of Investigation (FBI), being sworn, depose and state the following:

INTRODUCTION

1. Based on the information below, I believe there is probable cause that Evgeni Kopankov, Emanoel Borisov, and Paul Brooks are conspiring, and will attempt, to commit Interference with Commerce By Threats or Violence, in violation of 18 U.S.C. § 1951. Accordingly, I am submitting this affidavit in support of a criminal complaint and arrest warrants for Kopankov, Borisov, and Brooks.

2. The facts in this affidavit come from my personal observations, as well as information obtained from other federal agents, interviews with witnesses and confidential sources, and review of records and evidence relating to this investigation. This affidavit is intended to show only that there is sufficient probable cause for the requested arrest warrant and does not set forth all of my knowledge about the matter.

EXPERIENCE AND TRAINING OF THE AFFIANT

3. I have been a Special Agent with the FBI since January 2011. I completed training as a Special Agent at the FBI Academy in Quantico, Virginia. I am presently assigned to the San Francisco Division, Eureka Resident Agency. I work under the FBI's Criminal Branch where I investigate violent crimes, organized crime, and drug offenses. I have investigated numerous cases involving robberies in violation of 18 U.S.C. §§ 1951 and 2113. As a federal law enforcement agent, I am authorized to seek and obtain search warrants and arrest warrants, and to investigate violations of federal law, including those listed above.

FACTS SUPPORTING PROBABLE CAUSE

4. On March 20, 2019, a FBI Confidential Human Source (CHS) in Illinois told FBI agents that Borisov approached him about committing a robbery. CHS described Borisov as a large Bulgarian male with numerous tattoos, who previously worked security for strip clubs and marijuana properties in California. Borisov told CHS that there was an imminent arrival of approximately \$2.3 million in cash to a home in California belonging to a Bulgarian.

5. Borisov stated that the Bulgarian was involved in the cultivation and trafficking of marijuana and already had \$400,000 cash in his home. Borisov told CHS he wanted to go to California and rob the \$2.3 million cash from the Bulgarian, who he later referred to as "Ivan." Borisov planned to recruit others to help him with the robbery, including Borisov's friend, "Paul." FBI agents were able to identify "Paul," as Paul Brooks. *See* paragraph 14. Brooks was a former United States Marine, who had served in Iraq. CHS told the agents that Borisov had met Brooks while Brooks worked security for the Pol Katz strip club in Bridgeville, IL.

6. Borisov told CHS that Kopankov was the person providing information about the robbery target in California. Agents previously encountered Kopankov on December 19, 2018. On that day, FBI, Drug Enforcement Administration (DEA), and Humboldt County Drug Task Force (HC-DTF) agents detained Kopankov, alongside Edgar Garcia, and others. Garcia had chartered a private jet from Georgia to Arcata/Eureka Airport. After the jet landed in McKinleyville, law enforcement saw Garcia and his associates get out of the plane with luggage and drive to a Holiday Inn Airport Hotel. Kopankov met Garcia and his associates at the hotel. Agents deployed a narcotics K-9 dog on all of the vehicles that Garcia, Kopankov, and his associates were using.

7. The narcotics K-9 dog alerted to the presence of controlled substances. As a result of the alert, HC-DTF agents obtained a search warrant for the vehicles. Agents searched the luggage from the jet and found over \$2 million cash, which DEA administratively seized as drug proceeds. Agents also located a cell phone belonging to Kopankov inside the vehicles. A search of this cell phone revealed Kopankov's phone number as 224-600-0908. On April 1, 2019, CHS asked Borisov what Kopankov's phone number was, and Borisov told him 224-600-0908. Open source checks also identified this number as belonging to Kopankov.

8. On March 28, 2019, CHS met with Borisov and Brooks. CHS recorded the conversations. During this meeting, Borisov told CHS that Kopankov had been with a very big Mexican guy named "Edgar," when he got caught with the money. It was Edgar's money. Kopankov explained to Borisov that Edgar and Ivan had an ongoing dispute over a property sale between them the previous year. Kopankov intentionally spread rumors that "the Mexicans" were going after Ivan because of the dispute, which scared Ivan. Based on my familiarity with this case, I believe "Edgar" is Edgar Garcia, who is mentioned above.

9. Borisov said Kopankov told him that \$2.4 - \$3 million cash was going to arrive to Ivan's property in California the following weekend. Kopankov claimed to have a Bulgarian guy giving him the information, who wanted to set up Ivan. Kopankov hoped that his rumors about "the Mexicans" would make Ivan incorrectly assume that "the Mexicans" had robbed him.

10. Borisov stated that he would do "the hard part," but that he needed Brooks to watch his back. Borisov said that Kopankov had agreed to provide the guns for the robbery, and he had agreed to split the robbery proceeds three ways.

11. From March 30, 2019, to April 1, 2019, CHS recorded a series of meetings with Borisov and Brooks. During these meetings, Borisov told CHS that Kopankov had determined

that Ivan's property was too well guarded for a robbery. Instead, they agreed to rob \$3 million cash held by Sergey at another property in California. Borisov said that Kopankov would not give him the locations of Ivan and Sergey's properties until he [Kopankov] took them there. Borisov provided the following details of the plan he developed with Kopankov:

- a. Kopankov would leave Illinois on April 1, 2019, and drive to California;
- b. Borisov and Brooks would obtain one-way airfare from Chicago to Arcata-Eureka Airport (ACV) in McKinleyville, CA on April 3, 2019;
- c. Kopankov would pick up Borisov and Brooks from ACV and transport them to Sergey's property;
- d. Kopankov would provide the guns for the robbery;
- e. Once at Sergey's property, they would set up a tent in the woods near the gate to the property; and
- f. When Sergey came down to the gate, Borisov and Brooks would kidnap Sergey and force him to tell them the location of the money on the property.

12. During a meeting on April 1, 2019, Borisov called Kopankov and put him on speaker phone. CHS heard Kopankov say that he was prepared to hurt Sergey if he had to. CHS also stated Kopankov also stated over speaker phone that he would buy masks and bring them to the airport. Borisov wanted CHS to help transport the money to Illinois after the robbery. Borisov stated that he wanted to rob Ivan after robbing Sergey.

13. On that same day, CHS went with Borisov and Brooks to Walmart in Northlake, Illinois, to purchase equipment for the robbery. CHS purchased boots, pants, and backpacks for Borisov and Brooks because Borisov and Brooks did not have money. They also discussed Paul obtaining radios to use during the robbery.

14. On April 1, 2019, CHS purchased one-way airfare tickets for Borisov and Brooks, using the following names and dates of birth for Borisov and Brooks: Emanuel Borisov, DOB:

11/18/1990, and Paul Brooks, DOB: 4/25/1984. The flights were scheduled to arrive at ACV at 5:30 p.m. on April 3, 2019. CHS purchased the tickets because Borisov and Brooks did not have enough money to buy the tickets for themselves.

15. During the series of recordings, Borisov also discussed with CHS and Brooks his interest in other potential robberies. These robberies involved individuals named "Slavi" and "Dorothy," but Borisov said \$50,000 to \$60,000 might not be worth the effort. Another involved Ivan's partners "Vlado" and "Gala," whom Borisov said had \$5 to \$6 million in a house in Mt. Prospect, Illinois. Based on my investigation, I believe "Vlado" to be Vladamir Pavlov and "Gala" to be Galina Nedialkova. They are business partners with an individual named Ivan Iliev. Pavlov, Nedialkova, and Iliev own V&I Construction (V&I). I am familiar with V&I because, on November 27, 2018, I assisted in a seizure of over 10,000 pounds of processed marijuana on a property operated by V&I. The property is located in Humboldt County, California. Based my investigation, training, and experience, I believe Ivan Iliev is the "Ivan" that Kopankov, Borisov, and Brooks discussed robbing. Furthermore, I believe all of the robbery targets are involved in the business of cultivating marijuana.

16. On April 3, 2019, Borisov and Brooks arrived at the San Francisco International Airport. Their flight, United Airlines flight 5555, has a layover in San Francisco, and is expected to depart at 4:10 p.m. for their final destination, ACV in McKinleyville.

17. I believe, based on my training, experience, consultations with other agents, review of FBI CHS reports, and review of evidence, including the recordings, that Kopankov, Borisov, and Brooks are conspiring and attempting to commit Interference with Commerce By Threats or Violence, in violation 18 U.S.C. § 1951, on or about April 3, 2019. Additionally, I believe Kopankov, Borisov, and Brooks have committed several overt acts in furtherance this conspiracy,

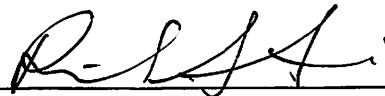
such as: Kopankov driving from Illinois to California; Borisov and Brooks flying from Illinois to California; Borisov and Brooks acquiring equipment for the robbery; and all three arranging to meet at ACV in preparation for the robbery.

REQUEST FOR SEALING

18. I further request that the Court order that all papers in support of this application, including the affidavit and search warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Disclosure of the existence of this Complaint or arrest warrant could compromise the safety of victims in the case, as well as the safety of law enforcement agents executing the arrest warrant. Additionally, the requested sealing is reasonably necessary to protect against the potential destruction of evidence and to prevent the possible flight of the defendant. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize the investigation.

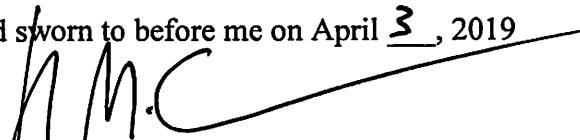
CONCLUSION

19. For the reasons set forth above, I respectfully request that the Court issues warrants for the arrests of Evgeni Kopankov, Emanoel Borisov, and Paul Brooks for conspiring and attempting to violate 18 U.S.C. § 1951.



Richard A. Smith, Special Agent
FEDERAL BUREAU OF INVESTIGATION

Subscribed and sworn to before me on April 3, 2019


Honorable Robert M. Illman
UNITED STATES MAGISTRATE JUDGE